

STATEMENT OF BASIS (AI No. 29947)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0091201 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Delgado Community College
Delgado Fire School
615 City Park Ave.
New Orleans, LA 70119

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: June 3, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: March 1, 2004
LPDES permit expiration date: February 28, 2009
EPA has not retained enforcement authority.

C. Date Application Received: November 25, 2008

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - fire fighting training facility**

This existing facility operates to provide the service of training personnel in fire prevention and preparedness and fire fighting. All sanitary wastewater is discharged to a sewage lift station and flows through a sewage line to the municipal sewage treatment plant.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 8222

C. LOCATION - 13200 Old Gentilly Road in New Orleans, Orleans Parish
Latitude 30°00'56", Longitude 89°55'34"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: fire extinguishing wastewater, and stormwater runoff
Treatment: oil/water separator followed by gravity settling in a retention basin

Location: at the point of discharge from the retention basin
(Latitude 30°00'58", Longitude 89°55'32")

Flow: 14,400 gpd

Discharge Route: Old Gentilly Road ditch, thence into Michoud Boulevard ditch, thence into Bayou Michoud

4. RECEIVING WATERS

STREAM - Old Gentilly Road ditch, thence into Michoud Boulevard ditch, thence into Bayou Michoud

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 041401

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL WATERBODIES

Subsegment 041401 of the Lake Pontchartrain Basin is listed on LDEQ's Final 2006 303(d) List as impaired for organic enrichment/low DO, and pathogen indicators. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of the TMDL for the Lake Pontchartrain Basin, suspected causes for impairment which are not directly attributed to minor industrial point sources have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Changes from previous permit: None

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

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B. DMR Review/Excursions - The DMRs were reviewed for the period of April 2007 through March 2009.

<u>DATE</u>	<u>PARAMETER</u>	<u>OUTFALL</u>	<u>REPORTED VALUE</u>		<u>PERMIT LIMITS</u>	
			<u>MONTHLY AVERAGE</u>	<u>DAILY MAXIMUM</u>	<u>MONTHLY AVERAGE</u>	<u>DAILY MAXIMUM</u>
4/07	COD	001	---	512	---	125
4/07	Oil & Grease	001	---	79.5	---	15
6/07	COD	001	---	307	---	125
6/07	Oil & Grease	001	---	40.8	---	15
11/07	COD	001	---	222	---	125
11/07	Oil & Grease	001	---	20.2	---	15
12/07	COD	001	---	258	---	125
12/07	Oil & Grease	001	---	29.5	---	15
2/08	COD	001	---	140	---	125
7/08	Oil & Grease	001	---	17.5	---	15
12/08	COD	001	---	157	---	125
12/08	Oil & Grease	001	---	17.9	---	15

8. EXISTING EFFLUENT LIMITS

Outfall 001		Measurement	Sample
	Daily Max.	Frequency	Type
COD	125 mg/l	1/month	grab
Oil and Grease	15 mg/l	1/month	grab
pH	6-9	1/month	grab

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9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 041401 of the Lake Pontchartrain Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2341.B.14.a-k, stormwater discharges from facilities classified as 8222 are not considered to be associated with industrial activities. However, an SWP3 is included in the permit since there is a potential for stormwater contamination from processes including fire extinguishing operations.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. For renewal permit issuance, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility. (see Narrative Requirements for the AI).

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Rationale for Delgado Community College

1. Outfall 001 fire extinguishing wastewater, and stormwater runoff (estimated flow is 14,400 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	BPJ; *
COD	--:125	BPJ; *
Oil and Grease	--:15	BPJ; *
pH (su)	6.0-9.0	BPJ; *

Treatment: oil/water separator followed by gravity settling in a retention basin

Monitoring Frequency: monthly

Limits Justification: parameters regulated on best professional judgement (BPJ) in accordance with the previous permit. The COD limit is in accordance with permitting requirements for mixed stormwater wastewaters.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.